

AO 106 (REV 4/10) Affidavit
for Search Warrant

AUSA Maureen B. McCurry, (312) 353-8788

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

Case No.22M534

the US Priority Mail package bearing tracking number
9505 5150 5492 2187 6600 57, further described in
Attachment A

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Anthony Volpicelli, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

Code Section

Offense Description

Title 21, United States Code, Section 843(b)

Narcotics offenses

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.

Anthony Volpicelli

Applicant's Signature

ANTHONY VOLPICELLI, Postal Inspector

U.S. Postal Inspection Service

Printed name and title

Pursuant to Fed. R. Crim. P. 4.1, this Application is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the statements in the Application and Affidavit by telephone.

Date: July 13, 2022

M. David Weisman

Judge's signature

City and State: Chicago, Illinois

M. DAVID WEISMAN, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Anthony Volpicelli, being duly sworn, state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service and have been so employed since approximately May 2021. As part of my duties as a Postal Inspector, I investigate criminal violations relating to violations of the federal laws relating to the mails and to controlled substances.

2. This affidavit is made in support of an application for a warrant to search the US Priority Mail Parcel with Tracking Number 9505 5150 5492 2187 6600 57 described further in Attachment A (the “**Subject Parcel**”), for evidence, instrumentalities, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Section 843(b).

3. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL

4. On or about July 12, 2022, I inspected the **Subject Parcel** at the Palatine Post Office, 440 W. Colfax Street, Palatine, Illinois. The **Subject Parcel** was mailed on or about July 6, 2022, from San Diego, California, and is addressed to “Rogelio Hernandez, 1837 N. Goodwin Drive, Apartment 3B, Palatine, Illinois 60074,” with a return address of “Daniel Casillas, 6114 Daisy Avenue, San Diego, California 92114.” The **Subject Parcel** bears approximately \$16.10 in postage, measures approximately 12 inches by 3.5 inches by 14.125 inches, and weighs approximately 4 pounds.

5. I observed characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance. Specifically, I ran the sender and recipient names and addresses on the **Subject Parcel** through a law enforcement database. The sender’s name, “Daniel Casillas,” is not associated with the sender address. Further, although the last name “Hernandez” is associated with the recipient’s address, the name “Rogelio Hernandez” is not. Based on my training and experience, fictitious sender or receiver names, and fictitious return addresses, can indicate that the sender or receiver does not want to be associated with the parcel.

6. While the characteristics I describe above can be consistent with parcels that do not contain contraband, based on my training and experience, the

combination of these characteristics led me to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

7. On or about July 12, 2022, I arranged for a Des Plaines Police Department Officer and his canine partner, “Jager,” to meet with me and examine the **Subject Parcel**. According to the Canine Officer, “Jager” is certified annually by the Illinois Law Enforcement Training and Standards Board (ILETSB) as a narcotics dog. “Jager” was most recently re-certified on or about March 4, 2022. “Jager” is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, and methamphetamine. “Jager” is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, “Jager” has successfully alerted to controlled substances in U.S. Mail Parcels and letters on approximately 158 occasions since January 2018, with a success rate of approximately 88%. To the best of my knowledge, ILETSB does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

8. On or about July 12, 2022, at the Irving Park Road Domicile in Chicago, Illinois, I arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 15 other parcels in the workroom area. I then witnessed “Jager” examine the parcels and observed “Jager” alert by sitting next to the **Subject Parcel**. “Jager” did not alert to any of the other parcels. The Canine

Officer informed me that “Jager’s” actions indicated the presence of controlled substances in the **Subject Parcel**. I then took custody of the **Subject Parcel**.

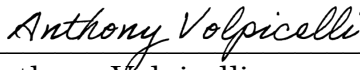
9. Additionally, based on my training and experience: (i) individuals who engage in the trafficking of illegal controlled substances often exchange cash through the mail; (ii) money that is handled by individuals who also handle drugs or is in the vicinity of drugs can retain the scent of drugs, which dogs can smell; and (iii) in other such cases, narcotics dogs have alerted to a package that has contained money.

II. CONCLUSION

10. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the Subject Parcel, as further described in Attachment A.


11. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.



Anthony Volpicelli
Postal Inspector
U.S. Postal Inspection Service

Sworn to and affirmed by telephone this 13th day of July, 2022



Honorable M. DAVID WEISMAN
United States Magistrate Judge

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

A USPS Priority Mail Express Parcel with Tracking Number 9505 5150 5492 2187 6600 57, which is a package weighing approximately 4 pounds, bearing approximately \$16.10 in postage, and measuring approximately 12 inches by 3.5 inches by 14.125 inches, mailed on or about July 6, 2022, from San Diego, California, and addressed to “Rogelio Hernandez, 1837 N. Goodwin Drive, Apartment 3B, Palatine, Illinois 60074,” with a return address of “Daniel Casillas, 6114 Daisy Avenue, San Diego, California 92114.”

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities and contraband concerning violation of Title 21, United States Code, Section 843(b), as follows:

1. Controlled substances.
2. Packaging for controlled substances.
3. United States currency.
4. Items that identify the sender or receiver of the parcel.